

Margaret M. Anderson
Ryan T. Schultz
FOX, HEFTER, SWIBEL,
LEVIN & CARROLL, LLP
200 West Madison Street
Suite 3000
Chicago, IL 60606
Ph: 312.224.1200
Fx: 312.224.1201

Attorneys for Universal Underwriters
Insurance Company

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

	X	
	:	Chapter 11 Case No.
In re	:	
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i>,	:	09-50026 (REG)
f/ka General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
	X	

RESPONSE OF ZURICH DIRECT UNDERWRITERS TO DEBTORS 220TH
OBJECTION TO CLAIMS

Universal Underwriters Insurance Company and its affiliates, doing business as Zurich Direct Underwriters (collectively “Zurich Direct”) for its response to the Debtors 220th Omnibus Objection states as follows:

1. Zurich Direct filed a Proof of Claim, Proof of Claim No. 64777, in the chapter 11 case of Motors Liquidation Company (f/k/a General Motors Corporation) (the “Debtor”), in the amount of \$41,805.51 asserting contribution and indemnity claims against the Debtor. The Debtor objected to the Proof of Claim on the grounds that such claim should be disallowed under 11 U.S.C. § 502(e) as a contingent, unliquidated claim for contribution or reimbursement.

2. Zurich Direct issued certain insurance policies Bill DeLuca Buick which sold and/or serviced automobiles manufactured or sold by the Debtor. Pursuant to the terms of the dealership agreements between Bill DeLuca Buick and the Debtor, the Debtor agreed, with certain limitations, to assume the defense of the dealer and to indemnify the dealer for any judgments in any lawsuit against the dealer relating to a product manufactured or sold by the Debtor. Bill DeLuca Buick may have also state law rights of contribution and indemnity against the Debtor. Zurich Direct filed a Proof of Claim, as subrogee of Bill DeLuca Buick, which contained proof of actual payments of claims for damages to a Buick and medical expenses incurred by the driver of the Buick for which the Debtor is required to indemnify Bill DeLuca Buick. The Proof of Claim does not assert a contingent or unliquidated claim.

WHEREFORE, for the reasons stated above, the Debtors' objection to the Proof of Claim filed by Zurich Direct Underwriters should be overruled.

Dated: Chicago, Illinois
May 10, 2011

/s/ Margaret M. Anderson
Margaret M. Anderson
Ryan T. Schultz
FOX, HEFTER, SWIBEL, LEVIN &
CARROLL, LLP
200 West Madison Street
Suite 3000
Chicago, IL 60606
Ph: 312.224.1200
Fx: 312.224.1201
Email: panderson@fhslc.com
Email: rschultz@fhslc.com

CERTIFICATE OF SERVICE

I, Margaret M. Anderson, an attorney, hereby certify that on May 10, 2011, the **Response of Zurich Direct Underwriters to Debtors 220th Objection to Claims** was filed *electronically* through the Court's ECF Filing System to the entities and individuals listed on the attached Service List.

/s/ Margaret M. Anderson

SERVICE LIST

<p>Attorneys for the Debtors</p> <p>Weil, Gotshal & Manges, LLP 767 Fifth Avenue New York, NY 10153 Attn: Harvey R. Miller Attn: Stephen Karotkin Attn: Joseph H. Smolinsky</p>	<p>The Debtors</p> <p>Motors Liquidation Company 401 South Old Woodward Avenue Suite 370 Birmingham, MI 48009 Attn: Thomas Morrow</p>
<p>Attorneys for the Statutory Committee of Unsecured Creditors</p> <p>Kramer Levin Naftalis & Frankel LLP 1177 Avenue of the Americas New York, NY 10036 Attn: Thomas Moers Mayer Attn: Robert Schmidt Attn: Lauren Macksoud Attn: Jennifer Sharret</p>	<p>Attorneys for the United States Department of the Treasury</p> <p>Cadwalader, Wickersham & Taft LLP One World Financial Center New York, NY 10281 Attn: John J. Rapisardi</p>
<p>Attorneys for the Official Committee of Unsecured Creditors holding Asbestos-related claims</p> <p>Caplin & Drysdale, Chartered 375 Park Avenue 35th Floor New York, NY 10152-3500 Attn: Elihu Inselbuch Attn: Rita C. Tobin</p>	<p>Attorneys for the Official Committee of Unsecured Creditors holding Asbestos-related claims</p> <p>Caplin & Drysdale, Chartered One Thomas Circle, N.W. Suite 1100 Washington, DC 20005 Attn: Trevor W. Swett III Attn: Kevin C. Maclay</p>
<p>Attorneys for Dean M. Traftlet in his capacity as the legal representative for future asbestos personal injury claimants</p> <p>Stutzman, Bromberg, Esserman & Plifka 2323 Bryan Street Suite 2200 Dallas, TX 75201 Attn: Sander L. Esserman Attn: Robert T. Brousseau</p>	<p>Attorneys for Export Development Canada</p> <p>Vedder Price, P.C. 1633 Broadway, 47th Floor New York, NY 10019 Attn: Michael J. Edelman Attn: Michael L. Schein</p>

<p>United States Department of the Treasury 1500 Pennsylvania Avenue NW Room 2312 Washington D.C. 20220 Attn: Joseph Samarias</p>	<p>Office of the United States Trustee for the Southern District of New York 33 Whitehall Street 21st Floor New York, NY 10004 Attn: Tracy Hope Davis</p>
<p>General Motors, LLC 400 Renaissance Center Detroit, MI 48265 Attn: Lawrence S. Buonomo</p>	<p>United States Attorney's Office Southern District of New York 86 Chambers Street Third Floor New York, NY 10007 Attn: David S. Jones Attn: Natalie Kuehler</p>
<p>Attorneys for Wilmington Trust Company as GUC Trust Administrator and Wilmington Trust Company as Avoidance Action Trust Administrator</p> <p>Gibson, Dunn & Crutcher LLP 200 Park Avenue 47th Floor New York, NY 10166 Attn: Keith Martorana</p>	<p>GUC Trust Monitor and Avoidance Action Trust Monitor</p> <p>FTI Consulting One Atlantic Center 1201 Wst Peachtree Street Suite 500 Atlanta, GA 30309 Attn: Anna Phillips</p>